



CORPORATE SOCIAL MEDIA POLICY

SHOW RESPECT. BE PROFESSIONAL. CARE.

Effective Date: 04 June 2018

PURPOSE

This document applies to all employees of Odfjell SE and other companies within the Odfjell Group of companies, who have one or more personal social media accounts and who uses these accounts to publish information, communicate and interact.

The Odfjell Social Media Guidelines are designed to help you:

- *Communicate on social media platforms as Odfjell employee*
- *Interact and engage appropriately online*
- *Protect IT security and personal safety online*

'Social media' includes the collective of online communications channels dedicated to user-generated content, community-based input, interaction and collaboration such as Facebook, Instagram, LinkedIn, Twitter, Snapchat, YouTube, blogs etc.

Social media channels are easily accessible and a part of most people's daily lives; to read news, be entertained, be inspired and to interact and communicate with family, friends, colleagues and business relations. Social media has blurred the gap between our personal and professional lives, and our professional responsibilities and relationships are intertwined with our online persona. People are likely to form an opinion about a company based on the behaviour of its employees – even when employees are posting from personal accounts.

Odfjell recognises and supports that social media is commonly used by our employees. The below guidelines set out the expectations for how to operate online as employee of Odfjell, both during and outside working hours, at sea or on shore. Please follow these guidelines before you comment or post.

SCOPE

The Odfjell Corporate Social Media Policy applies for all Odfjell employees as defined above, regardless of geographic differences.

ODFJELL VALUES & CODE OF CONDUCT

The Odfjell Corporate Social Media Policy is closely connected to the Company's Corporate Values and Code of Conduct. For social media usage, the following Odfjell values are particularly applicable:

Professional:

Skilled, dedicated and compliant

Show the right behaviour and attitude

Proactive:

Assess risk and give highest priority to safety

Take proper precaution

The Social Media Policy also relates to the [Odfjell Code of Conduct for employees](#). The Code of Conduct puts a great emphasis on strong ethical behaviour, transparency, and compliance with applicable, relevant laws and regulations. Odfjell expects all employees to show courtesy, non-discriminatory and respectful behaviour, to be honest and proper in our conduct, respect confidential information and show professionalism. For the complete Code of Conduct, see [here](#).

CONFIDENTIALITY

Act responsibly with the information you are entrusted with as part of your role in Odfjell. Social media encourages you to connect and share information. Through your working relationship with Odfjell, you have access to confidential information that should not be made public. Respect confidentiality in all your online communications, as you do in all other conversations relating to your work. This is of the utmost importance, as breaches of confidentiality can have severe negative personal, organisational and financial consequences.

Confidential information includes – but are not limited to – the following examples:

- Any information that can be considered insider information, including Odfjell's financial situation and strategic discussions, corporate strategy and improvement programs
- Non-public financial information and predictions of future performance
- Ongoing development of systems, products, processes and technology
- Personal information about colleagues
- Legal information and contracts
- Detailed safety procedures and safety issues on board ships

Keep topics focused on publicly released information when publishing posts, sharing updates or commenting about Odfjell and Company activities. Feel free to share links and updates from Odfjell external sites such as [Odfjell.com](#) and [Odfjell's LinkedIn page](#). Do not share information from Insite or internal newsletters, presentations and other internal communication arenas.

ONLINE ETIQUETTE & GUIDELINES

Protect your own, your colleagues and the Company's reputation and safety

Take care of your own professional reputation and Odfjell as a brand. Reflect before you post, and avoid posting videos, photos, comments or information about the Company, yourself or your colleagues that could lead to loss of reputation, invasion of privacy, exposure to IT security risks or to criminal activities. Social media has the power to make or break peoples and brands reputation. Thumb rule: Only post content that you would be comfortable showing up in your manager's inbox or in your colleagues' feed.

Uphold your personal responsibility

You are personally responsible for all content you publish. Before publishing, bear in mind that anything published can go viral, and the internet never forgets – even if you delete your previously published content. Published content on a page or group is quite easily spread and hence available outside of your core intended recipients. Make sure that your facts are correct, and that you stand behind what you post – today and tomorrow.

Have you posted something that wasn't true and/or you regret? Be the first to apologise, take responsibility and earn your mistake. If you feel the slightest insecurity about a post you plan to publish, play it smart and review.

Mind your manners

Be nice. Treat other people, your online friends and followers, past and present colleagues, partners, companies and competitors with respect. Be professional, avoid posting comments or photos that can be interpreted as offensive, bullying, discriminatory, illegal, inappropriate or threatening. Acknowledge differences of opinion, and show proper consideration for topics that may be considered objectionable or inflammatory. Put simply: The rules for proper behaviour in the real world equally apply to the digital world.

Identify yourself

Be transparent and honest by identifying yourself in your social media interactions and profile(s). Ensure that your personal profile section on your social media account(s) is consistent with how you want to present yourself towards colleagues, business partners and other work related contacts.

For transparency, a disclaimer in your profile can help clarify (such as "Views expressed are my own and do not necessarily represent the views of my employer"), however note that this is no legal protection or clear-cut separation of your personal and professional lives. In this highly connected digital world you are still quickly associated with your employer.

Respect privacy

Be respectful of privacy considerations. What people consider private varies greatly, so make sure not to assume. Your social media accounts are personal, and people have different ways of managing their accounts and preferences. You should not feel pressured to accept friend requests from colleagues, customers or other professional connections if you prefer to keep your connections to family and friends only. Equally, you should not interpret it as a bad sign if a professional contact does not accept your friend request.

Protect your colleagues and connections by refraining from sharing their personal information, photos, videos, conversations or statements unless you have their clear permission to do so. When you do make a reference, link back to the source.

Be aware that many ports, terminals and other industry venues have strict security and safety regulations concerning both confidentiality and equipment safety. Make sure to consider this before using video or photo equipment.

Respect intellectual property

Photos, videos, music and other material posted on internet are not "free for all". Other people's or companies' online material are often protected by copyright regulations. Check this out before reposting or borrowing. Breach of these regulations can lead to fines and possible legal actions. Basically: If it's not yours, don't use it.

Stay security smart

Be very aware of possible spam, phishing attacks and malware. Cyber-attacks are a constant and growing threat, and can have severe consequences. Be sceptical when you experience that someone is using temptations, fear, trust or a combination of these while trying to make you click on a link, install software, or pass on information. Be aware of possible false friendship requests, this can be a scam.

Make sure to familiarise yourself with the security settings and terms of service in your chosen social media platform. Confirm that your account(s) have proper security settings, and create secure passwords: Never use the same password across work and private accounts, and avoid using the same password for several accounts. For extra security, it is recommended to install a two-step login authorisation for your devices – this reduces the risk of ID theft and false logins. Follow the Odfjell IT departments updates and guidelines on how to stay security safe, and report incidents to the [IT helpdesk](#).

Use your private e-mail account when signing up

When you register or post to a social media site using your Odfjell email address, you are far more exposed for targeted phishing and other cyber-attacks, against you personally and against the company. Protect yourself and the company by using f.ex. a @gmail or @hotmail address. This makes it harder for cyber criminals to pinpoint you and target their attacks.

In addition: When using your Odfjell address, your private comments and views may be incorrectly associated with the Company and construed as an official Company opinion. In some countries, using your work email address also directly links you to the company in a way that makes you liable for company activities – even if it's not your responsibility.

Forward internally if an official, corporate response may be needed

Make sure to never give the impression of being an official spokesperson for the Company or to commit Odfjell to any action unless you are authorised to do so. Do not engage with news media/journalists or industry analysts to discuss Odfjell strategy or business on the Company's behalf. If you notice comments or discussions that would possibly need an official response, please alert the Communications Manager.

Follow whistleblowing procedures

In case of crisis, or if you notice a potential legal issue or breach of conduct that would possibly need an official response, please avoid entering the discussion online. Use the internal channels, and bring the issue to the attention of your manager/Master, Compliance Officer or via Odfjell's [Reporting Hotline](#).

Show respect and care

And finally: When you are at work, please keep the focus on your work tasks and refrain from spending time on online activities not related to Odfjell. Be professional, show respect and care for your work, yourself, your team and the people around you.

CONTACT INFORMATION

IT Helpdesk: helpdesk@odfjell.com
[Anonymous Reporting Hotline](#)
[Compliance Officers / Designated Persons](#)

Communications Manager

Anngun Dybsland, Anngun.dybsland@odfjell.com / +47 41 54 88 54 / +47 55 27 46 41

Note: Mainstream media inquiries are to be forwarded to your manager, Master or the Communications Manager.

RELATED POLICIES & RESOURCES

[Code of Conduct](#)

[Corporate values](#)

[Corporate mission and vision](#)

[IT Instructions](#) – PRO-2705

[Media and public affairs responsibilities](#)

[Cyber Security leaflet](#)

[Corporate Mission and Policies](#)

[Whistleblowing policy](#)

[Disciplinary action](#)